

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

03-MDL-1570 (GBD)(SN)

**TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**IRAN NOTICE OF
AMENDMENT**

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This document relates to:

Jessica DeRubbio, et al. v. Islamic Republic of Iran, No. 1:18-cv-05306 (GBD) (SN)

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 1, as permitted and approved by the Court's Order of October 28, 2019, MDL ECF No. 5234. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, MDL ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), MDL ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (MDL ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☐ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, MDL ECF No. 3237
- ☒ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	New Plaintiff's Name (alphabetical by last name)	New Plaintiff's State of Residency at Filing (or death)	New Plaintiff's Citizenship/ Nationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1.	Edu Umana, individually, as surviving sibling of Sadie Ette	PA	Nigeria	Sadie Ette	Sibling	ECF No. 1 ¶6, App. ¶15
2.	Itauma Ette as Personal Representative of the Estate of Sunday Itauma Ette, deceased, the late parent of Sadie Ette	NY	Nigeria	Sadie Ette	Parent (Deceased)	ECF No. 1 ¶6, App. ¶15
3.	Itauma Ette as Personal Representative of the Estate of Ekaette Ette, deceased, the late parent of Sadie Ette	NY	Nigeria	Sadie Ette	Parent (Deceased)	ECF No. 1 ¶6, App. ¶15
4.	Stephen Feely, individually, as surviving sibling of Francis J. Feely	PA	United States	Francis J. Feely	Sibling	ECF No. 1 ¶6, App. ¶18
5.	Alice Feely, individually, as surviving sibling of Francis J. Feely	NY	United States	Francis J. Feely	Sibling	ECF No. 1 ¶6, App. ¶18
6.	Matthew Dorsey, individually, as surviving sibling of Jennifer L. Howley	NE	United States	Jennifer L. Howley	Sibling	ECF No. 1 ¶6, App. ¶83

7.	Andy Jean-Pierre, individually, as surviving child of Maxima Jean-Pierre	NY	United States	Maxima Jean-Pierre	Child	ECF No. 1 ¶6, App. ¶89
8.	Rachel Jean-Pierre, individually, as surviving child of Maxima Jean-Pierre	NJ	United States	Maxima Jean-Pierre	Child	ECF No. 1 ¶6, App. ¶89
9.	Anjunelly Jean-Pierre, individually, as surviving child of Maxima Jean-Pierre	VA	United States	Maxima Jean-Pierre	Child	ECF No. 1 ¶6, App. ¶89
10.	Ajax Jean-Pierre Jr., individually, as surviving child of Maxima Jean-Pierre	NY	United States	Maxima Jean-Pierre	Child	ECF No. 1 ¶6, App. ¶89

Dated: October 6, 2021

Respectfully submitted,

/s/ Jerry S. Goldman

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